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8	UNITED STATES DISTRICT COURT		
	DISTRICT OF NEVADA		
9	TEDES A MODALES) Case No: 2:16-cv-00230-JAD-NJK	
10	TERESA MORALES,) Case No: 2:10-cv-00230-JAD-NJK	
	Plaintiff)	
11) DEFENDANT'S MOTION FOR	
12	V.) EXTENSION OF TIME TO FILE CROSS-) MOTION TO AFFIRM OR NOTICE OF	
12	CAROLYN W. COLVIN, Acting) VOLUNTARY REMAND OF THE CASE	
13	Commissioner of Social Security,)	
1 4) (Second Request)	
1/1	Lietendant	`	
14	Defendant.)	
15	Defendant.))	
15) etting Commissioner of Social Security (the	
	Defendant Carolyn W. Colvin, Ac	cting Commissioner of Social Security (the	
15	Defendant Carolyn W. Colvin, Ac	this Court, for an extension of time to file her	
15 16	Defendant Carolyn W. Colvin, Ac Commissioner), moves, with the approval of		
15 16 17	Defendant Carolyn W. Colvin, Ac Commissioner), moves, with the approval of Cross-Motion To Affirm or Notice Of Volum	this Court, for an extension of time to file her	
15 16 17 18	Defendant Carolyn W. Colvin, Ac Commissioner), moves, with the approval of Cross-Motion To Affirm or Notice Of Volun August 8, 2016 to September 7, 2016, with	this Court, for an extension of time to file her ntary Remand Of The Case by thirty days from	
15 16 17 18 19	Defendant Carolyn W. Colvin, Ac Commissioner), moves, with the approval of Cross-Motion To Affirm or Notice Of Volun August 8, 2016 to September 7, 2016, with	this Court, for an extension of time to file her ntary Remand Of The Case by thirty days from all other dates in this Court's Order Concerning	
15 16 17 18 19 20	Defendant Carolyn W. Colvin, Ac Commissioner), moves, with the approval of Cross-Motion To Affirm or Notice Of Volun August 8, 2016 to September 7, 2016, with Review Of Social Security Cases extended a request for an extension.	this Court, for an extension of time to file her ntary Remand Of The Case by thirty days from all other dates in this Court's Order Concerning	
15 16 17 18 19 20 21	Defendant Carolyn W. Colvin, Accommissioner), moves, with the approval of Cross-Motion To Affirm or Notice Of Volundaugust 8, 2016 to September 7, 2016, with Review Of Social Security Cases extended a request for an extension. There is good cause because, since the	this Court, for an extension of time to file her ntary Remand Of The Case by thirty days from all other dates in this Court's Order Concerning coordingly. This is the Commissioner's second	
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1	Commissioner's counsel has had numerous	s other deadlines, including a dispositive motion in an
2	employment case, a settlement memorand	um, and multiple mentoring and reviewing duties in
3	the Office of the General Counsel. Counsel	el had a conference in an employment matter and was
4	also out of the office for five days. As	result, the Commissioner needs additional time to
5	properly respond to the issues Plaintiff raised in her Motion. Counsel makes this request in good	
6	faith without any intention to unnecessarily delay these proceedings. The Commissioner'	
7	counsel contacted Plaintiff, but at the time of filing, had not yet heard back.	
8		Respectfully submitted,
9	Date: August 8, 2016	DANIEL G. BOGDEN
10	Date. August 6, 2010	United States Attorney
11		BLAINE T. WELSH Chief, Civil Division
12	By:	/s/ April A. Alongi
13		APRIL A. ALONGI Special Assistant United States Attorney
14		Attorneys for Defendant
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20		IT IS SO ORDERED.
21		II IS SO ORDERED.
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23		
24	DATE: August 10, 2016	
25		THE HONORABIE NANCY J. KOPPE United States Magistrate Judge
26		•

1	DEFENDANT'S CI	ERTIFICATE OF SERVICE
2		
3	I certify that I caused a copy of Defendar	nt's Motion For Extension Of Time To File Cross-
4	Motion To Affirm Or Notice Of Voluntary	Remand Of The Case (Second Request) to be served
5	via CM/ECF notice, on:	
6		
7	RICHARD E. DONALDSON Esquire gunlawyer@aol.com	
8		
9	Data: August 9 2016	DANIEL G. BOGDEN
10	Date: August 8, 2016	United States Attorney
11		BLAINE T. WELSH Chief, Civil Division
12	By:	/s/ April A. Alongi
13		APRIL A. ALONGI Special Assistant United States Attorney
14		Attorneys for Defendant
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